



COEUR D'ALENE TRIBE

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Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th St. SW, Room TW-A325
Washington, DC 20554

electronically to: <http://fcc.gov/ecfs/filings/>

Re: WT Docket No. 18-120 Transforming the 2.5 GHz Band

The Coeur d'Alene Tribe (the "Tribe") not only occupies a reservation set aside by Executive Order on land it inhabited since time immemorial, but it also operates as an internet service provider through a subsidiary entity called Red Spectrum Communications. Through a series of grants, loan/grant and Tribal funded programs, Red Spectrum has constructed a robust fiber and wireless network across the Reservation. However, due to topography and funding limitations, it is simply not possible to reach all available customers in a commercially viable manner. Nor is it possible to compete consistently with large telecommunications companies due to the size of the operation, and tribes are in a unique position to actually put spectrum to good use. Often, commercial telecommunications companies will hoard licenses without serving customers, sometimes refusing to negotiate with tribes to access them. For these reasons and others, the Coeur d'Alene Tribe strongly urges the Commission to adopt policies allowing Tribes greater access to spectrum within their Reservations.

Additionally, Red Spectrum has the capability to use 2.5 GHz immediately. If made available, Red-Spectrum will re-configure its existing Mikrotik CPE's to utilize the 2.5 GHz band (2496-2690 MHz) for Point-to-Point and Multi-Point (last mile) wireless systems with already existing fiber and existing unlicensed microwave systems. The 2.5 GHz band offers new additional and much needed spectrum which permits the ability to increase wireless client counts and increase bandwidth and allow for improved and stable VoIP client communications.

For the 2.5 Ghz band, the most important, stand-out functionality is TDMA timing. TDMA timing offers clear guaranteed time-slot wireless communications from APs to clients and clients to APs. Red-Spectrum has utilized wireless TDMA timing on all our wireless communications for greater than 10 years. Red Spectrum had its wireless TDMA system tested and verified by the federal government while building out the original TDMA wireless system. That verification procedure proved Red Spectrum was able to utilize a 40 MHz wide channel and deliver 150 meg

of Internet connectivity over 15 miles. This new 2.5 GHz system will be expanded to allow 80 MHz and/or 160 MHz wide channels also include MIMO (Multiple-In Multiple-Out) polarity antennas. Red-Spectrum Communications has already tested, installed and proven this system to support near gig Internet throughput. 2.5 GHz would support more customers with even greater Internet broadband demands.

Sincerely,



Ernest L. Stensgar
Chairman